

**Highway 89 Storage Units Site  
Conference Call Note  
Re: ATK Draft Work Plan**

**Date:** November 18, 2009

**Time:** 2:00 pm

**Attendees:**

ATK: Dave Gosen, George Gooch, Rob Yarosik, Randy Fulmer, Ron Bowlin.

EPA: Gina Andrews and Tien Nguyen

- EPA gave overview of call, per agenda, and to discuss specifics of Work Plan (the Plan) submitted by ATK to EPA on 11/17/2009 thru email.
- Discussion of qualifications for Project Coordinator for the clean-up, Ron Bowlin. EPA requested more information on Ron's experience/knowledge of site specific issues (i.e. has he overseen chemical containers characterization, overpacking, bulking or consolidation, and transportation and disposal?); ATK will provide and emphasized that other technical experts will assist Ron. Tien requested all personnel and their qualifications be outlined in an attachment to the Plan rather than in the Plan. ATK agreed to this.
- Discussion of Contractors for the project. Tien and Gina requested more information on how the contractors will help to conduct the clean-up, looking for more details on how they'll interact, who will be on site and what specific tasks they'll be required to do. EPA also requested more information on the personnel from Veolia (ATK designated contractor) that will be working at the Site so that we can better understand the relationship - are they subcontractors, who is on the team and who is the lead? ATK will develop more information on this item.
- Discussion of Work Plan items/concerns. EPA began outline of preferred example/outline for Plan. EPA will send this to ATK. Walking thru the Plan, EPA verbally provided comments or concerns in specific subjects in the Plan. Overall, EPA wants more details on how the clean-up will be implemented, what steps are taken to get the chemicals from the storage units to the disposal facility.
  - EPA asked for some detail/description related to how the anticipated sampling will conform to EPA Guidance/Requirements for QA/QC. ATK will tie this to their Waste Analysis Plan. In addition, EPA asked ATK to tie this also to information from the inventory and characterization generated by START. EPA provided to ATK the START lead's contact info (Andrew Longworth).
  - Specific to the schedule section in the Plan – current items under this heading are not really related to the project schedule. Thus more is needed to develop the schedule listed currently under section 3.0. Details should include estimates for timing to bulk and transport materials from each of the three site locations, where it's anticipated the waste will go, etc.
  - Section 5.0 – EPA noted that the PRSC section will be "none" or "not applicable" only when confirmation samples show the site is clean. ATK understood this.

- Section 8.0 – EPA requested ATK provide detail under this section to summarize what their emergency action procedures are.
- Discussion of HASP. Rob Yarosik prepared this document. EPA requested this person must be a designated Health and Safety Officer for the project and that we expect that person to be on-site frequently or that they are readily available.
  - EPA noted that we do not approve of the HASP (as currently shown in the plan) but that we concur only. ATK will remove us from the signature page.
  - EPA appreciated the listing of who is involved with the HASP but asked for more detail on who is associated with which company and what their role is at the site. ATK will develop this information.
  - Section 5.1 – Overall the list of chemicals is acceptable to EPA; however the description of “various fine powders” creates an “innocent” connotation when really this could be dangerous, such as magnesium and aluminum powders, which are strongly water reaction materials. EPA then requested ATK be more specific about other hazards and chemicals and associated threats at the Site (i.e. notes should be made related to chemicals such as sodium hydroxide powder and organic solvents). Finally there was brief discussion about the presence of asbestos containing material at the Site and ensuring the Plan reflects action to be taken to ensure this material isn’t incinerated.
  - Section 5.6.1.3. and 5.6.2.2. – EPA is not clear on the meaning of the “hot work permits” mentioned in these sections. ATK clarified this is an industry specific requirement they would have to satisfy for their company’s requirement. EPA asked they make note this is a requirement specific to ATK.
  - 5.9.1 – EPA asked for clarification on the ACGIH mentioned in the section. ATK described this as a standard IH handbook. We asked they just site the publication.
  - 5.10 – EPA noted that if they specify the 85 decibel level then they must be prepared to monitor to prove what the noise levels are. ATK will reword this section to reflect that, based on ATK data, the noise threshold will not likely be reached with the exception of when workers are operating forklifts or similar equipment.
  - Section 6.0 – There was some discussion over what items require real-time monitoring. EPA stated 6.1, 6.2 and 6.3 (specific for particulate) is required. ATK questioned this some; EPA noted that, while conditions are not likely to present threats associated with these headings, there is no way to prove this without monitoring. This is particularly important if/when nearby residents claim they were exposed. ATK appreciated this position and will develop these sections.
  - Section 8.1.1.1. should include hard hats as PPE
  - Section 8.1.1.2. should be denoted as requiring Level C PPE. Also EPA noted that workers should wear full-face respirators. ATK clarified that all workers would be required to wear these and will correct the plan.

- Section 9.0 should be updated to make note that these areas will be delineated with caution tape.
  - Section 11.0 – EPA noted that all workers at the Site must be HAZWOPER trained prior to participating in the clean-up.
  - Sections 13 and/or 14 should be updated to include a daily safety briefing. ATK will update.
- At the end of the call, ATK said that they understood EPA reviewed the emailed draft Plan sent yesterday (11/17) and ATK had not sent four required hard-copies of the Plan to EPA (required by the AOC) and asked if it was ok to wait to mail hard copies until the Plan revised. EPA agreed.